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To: Duchnak, Laura S CIV NAVFAC HQ, BRAC PMO
Cc: Lawrence Lansdale NAVFAC HQ; Herrera, Angeles; Chesnutt, John; Praskins, Wayne; Sanchez, Yolanda; Yogi, David
Subject: HPNS building RGs
Date: Thursday, August 26, 2021 3:20:02 PM

Hello Laura,

We look forward to receiving a proposal from the Navy, which we anticipated this week (about 2 weeks from our discussion). I know our staff had a discussion earlier today. I hope the proposal is as detailed as possible, identifying proposed changes from the Parcel G workplan, and clearly explaining how the Navy intends to use the retesting data to show that every building is safe for residential use. I understand that the radiologically impacted buildings at HPNS vary a lot in size and radiological use history, and that this range of conditions makes it challenging to demonstrate that every impacted building is safe for residential use. I hope the Navy proposal clearly explains the basis for the sensitivity of the measurements to be made during retesting. I understand that this is a key factor in how useful the data will be in verifying that the HPNS buildings can be safely occupied.

During the August 12 call, you said the Navy is directing its contractor to mobilize, and the contractor will be ready to begin retesting buildings in about two months. For the next two months, you committed to continue working with EPA on how retesting data can be used to verify that the buildings can be safely occupied as residences.

EPA will work with the State to review the Navy proposal. If, after consulting with the State, EPA concurs with the Navy's proposed approach we will provide our approval for the Navy to proceed with the retesting. If we conclude that the Navy's proposed approach poses a risk that the data will be insufficient to demonstrate that every HPNS building is safe for residential use, we will of course communicate that conclusion to the Navy.

I wanted to relay that EPA's Deputy Assistant Administrator Carlton Waterhouse hosted a listening session with external groups interested in the site, including Public Employees for Environmental Responsibility, Committee to Bridge the Gap, the Bayview Hunters Point Community Advocates (a community-based group), and local university professors. Participants stated that the site's radiological remediation goals are outdated and not protective, contamination is more widespread than the site conceptual model assumes, the remedy is inconsistent with unrestricted use called for in Proposition P, and the current community involvement approach is inadequate. In our response, we plan to inform these groups of the Navy's commitment to perform an evaluation of its community outreach and involvement program, as a response to our August 27, 2020 letter.

I look forward to reviewing your proposal. Let me know if you have any questions.

Enrique

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